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FEB 20 2020

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS  
SUPPRESSED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

)

Plaintiff,

)

v.

)

CAMERON H. SANCHEZ,

)

Defendant.

)

4:20CR132 RWS/JMB

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:

- (a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));
- (b) "sexually explicit conduct" to mean actual or simulated
  - (i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex,
  - (ii) bestiality,
  - (iii) masturbation,
  - (iv) sadistic or masochistic abuse, or
  - (v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. § 2256(2)(A)); and

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6)).

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(B) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. § 2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about December 8, 2019, and on or about February 13, 2020, in the Eastern District of Missouri, and elsewhere,

**CAMERON H. SANCHEZ**

the Defendant herein, did knowingly distribute material that contained image files of child pornography using any means and facility of interstate and foreign commerce, to wit the Defendant knowingly distributed image files of child pornography via the internet, to include but not limited to the following:

- a. "20191208\_212244\_HDR.JPG," a graphic image file depicting a prepubescent minor child exhibiting his genitals and anus as the focus of the image;

- b. "2019-12-08\_23-22-03\_EST\_1.jpg," a graphic image file depicting a prepubescent minor child exhibiting his genitals and anus as the focus of the image; and
- c. "2019-12-09\_19-07-35\_EST\_1.jpg," a graphic image file depicting a prepubescent minor exhibiting his genitals as the focus of the image with an adult hand in the image; in violation of 18 U.S.C. § 2252A(a)(2).

A TRUE BILL.

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FOREPERSON

JEFFREY B JENSEN  
United States Attorney

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